## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

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BABU THANU CHELLEN, PETER JERON,	· / / .
CHAKKUNGAL PAULOSE JOSEPH,	$\mathcal{L}_{\mathcal{L}}$
PANDIYALACKAL GREGORY REYNOLD,	$\begin{cases} F_{EB} = F_{EB} & F_{EB} \\ F_{BB} & F_{EB} & F_{EB} \end{cases}$
CHANDRAVILASAM RAMACHADRAN NAIR	(h)
BHARATA KUMARAN NAIR,	) S.
KUNJUPILLA KRISHNANKUTTY,	
POULOUSE MALERIL VARKEY,	) COURT !
KURIAKOT PARAN RAJE,	)
KATTU KANDATHIL VELAYUDHAN	<b>)</b>
SURRENDRAN and	)Case No. 02-85 EA (M)
ALLALANOIL KARUNAKARAN SHAJI,	)JURY TRIAL DEMANDED
JOHN DOE, RICHARD ROE	)
	)
Plaintiffs,	)
,	)
vs.	)
	)
JOHN PICKLE CO, INC. a domestic corporation,	)
	)
Defendant.	)
	•

## FIRST AMENDED COMPLAINT

Come now the Plaintiffs herein, and for further cause of action against the Defendant, and re-adopt and re-allege each and every allegation set out in the original Complaint, and further allege and state:

- That the Defendant is an Employer as set out in Title 42, U.S.C.A. 1981, and the
  Plaintiffs are Employees as there defined.
- 2. That within the limitations period set out in the said Act, the Defendant constructively discharged the Plaintiffs, by forcing them to work for pay which was less than the pay of other, similarly situated white citizens, because of the Plaintiffs' Race and Nationality.
  - 3. That the Plaintiffs are thus entitled to back pay, front pay, and all other appropriate



damages, in an amount in excess of \$10,000.00 including costs and attorney's fees.

4. That the acts or omissions of the Defendant were wilful, wanton and malicious, entitling the Plaintiffs to punitive damages, in excess of \$10,000.00, for which the Plaintiffs likewise pray.

WHEREFOR Plaintiffs each pray for actual and punitive damages in excess of \$10,000.00 per Plaintiff, costs, attorney fees, and all other relief at law or in equity.

Respectfully submitted,

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and

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